

**EXHIBIT A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, AND THE PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**[PROPOSED] ORDER GRANTING DEBTORS' MOTION FOR ORDER  
EXCLUDING EXPERT TESTIMONY OF DOUGLAS J. BRICKLEY**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Debtors' Notice of Motion and Motion for Order Excluding Expert Testimony of Douglas J. Brickley* (the "Motion"); filed by the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the sole Title III representative of Debtors the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Public Buildings Authority ("PBA"), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS," and together with the Commonwealth and PBA, the "Debtors") pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"),<sup>2</sup> the opposition by AmeriNational Community Services, LLC, as servicer for the GDB Debt Recovery Authority and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (collectively, the "DRA Parties"), the Oversight Board's reply thereto, and any argument thereon, and good cause appearing therefore,

**IT IS HEREBY ORDERED** that:

1. The Court has subject-matter jurisdiction over the Motion pursuant to PROMESA § 306(a)(1).
2. Venue is proper under PROMESA §§ 106(a) and 307, and 28 U.S.C. § 1391(b).
3. The Motion is **GRANTED**.
4. The DRA Parties are hereby precluded from offering any testimony of Douglas J. Brickley, including, but not limited to, the September 13, 2021 *Expert Report of Douglas J. Brickley*, at the Plan confirmation hearing, or in connection with Plan confirmation proceedings.

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101–2241.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE LAURA TAYLOR SWAIN  
United States District Judge